

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE WITNESS LACHANCE
(USPS-T-13) TO DOUGLAS F. CARLSON INTERROGATORIES
DFC/USPS-T13-1 THROUGH 6
(March 19, 2012)**

The United States Postal Service hereby provides the responses of witness LaChance to the above-listed interrogatories of Douglas F. Carlson, which were filed on February 24, 2012.

On March 5, 2012, the Postal Service filed partial objections to interrogatories DFC/USPS-T13-1 through 4. Pursuant to those objections, the Postal Service is limiting its responses to interrogatories DFC/USPS-T13-1 through 4 to the time period from enactment of the Postal Accountability and Enhancement Act of 2006 through the present. Furthermore, the Postal Service is limiting its response to interrogatory DFC/USPS-T13-2 to Postal Service policies and procedures only.

The interrogatories are stated verbatim and followed by the responses.

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS LACHANCE
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Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS LACHANCE
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DFC/USPS-T13-1

Please describe the efforts that the Postal Service has made in the past 15 years to inform customers of the service standards that apply to individual pieces of First-Class Mail that they send or seek to send.

RESPONSE (A partial objection to this interrogatory has been filed)

The Postal Service formerly made available CD-ROM and hard-copy ZIP Code directories to customers, which contained information on service standards. More recently, information for customers about the service standards that apply to individual pieces of First-Class Mail is available to customers on www.usps.com, and at the retail counter.

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DFC/USPS-T13-2

Please explain, and provide documents that explain, the Postal Service's policies and practices, both current and at any time in the past 15 years, for encouraging, enticing, "upselling," or otherwise causing customers who appear at a retail service window to purchase Express Mail or Priority Mail for mail that they wish to send. This interrogatory specifically encompasses policies or practices that might cause the Postal Service not to inform customers of the correct and applicable service standard for First-Class Mail when the Postal Service offers Express Mail or Priority Mail to customers seeking to send mail.

RESPONSE (A partial objection to this interrogatory has been filed)

Customers are informed at the retail counter of their mailing options, both in terms of service level and prices, so that they can determine what best suits their needs.

Information is also available at www.usps.com. The Postal Service advertises the availability of products through the public airwaves and in print media with the expectation that in doing so, customers are able to make informed choices about the mailing products and services they choose to purchase. There are no postal policies designed or intended to provide customers with incorrect or inapplicable information regarding products and services.

It is important to note that First-Class Mail weighing more than 13 ounces, that is not entered at commercial plus prices, must be upgraded to Priority Mail. Therefore, First-Class Mail would not be an option for a customer mailing at retail a package weighing more than 13 ounces. (See DMM 101.6.1, Maximum Weight and Size)

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The following training, guideline, and presentation documents (provided in library reference USPS LR-N2012-1/NP18) contain information pertinent to this interrogatory request:

- Retail Customer Experience Coordinator Training
- Revenue Generation/Rate Case materials for FY 2007, FY 2008 and FY 2009
(training was not developed for FY 2010 and FY 2011)
- USPS Training Guidelines ("BARE International" document), July 2011
- Sales Skills Clinic, Participant and Facilitator Guides, September 2011

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DFC/USPS-T13-3

Please confirm that the Postal Service has had policies or practices in place in various retail channels, including Automated Postal Centers, retail windows, and *www.usps.gov*, for at least 15 years to encourage customers to use Express Mail or Priority Mail instead of First-Class Mail to send mail. If you do not confirm, please explain.

RESPONSE (A partial objection to this interrogatory has been filed)

The Postal Service has policies in place that encourage customers to consider a variety of shipping options, including First-Class Mail, Priority Mail, Express Mail, and Parcel Post.

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DFC/USPS-T13-4

Please identify all advertising campaigns and similar efforts that the Postal Service has undertaken in the past 15 years to encourage customers to use First-Class Mail or to inform customers of the service standards for First-Class Mail. Please provide documents and details.

RESPONSE (A partial objection to this interrogatory has been filed)

The Postal Service has not purchased advertising for the purpose of specifically encouraging the use of First-Class Mail or informing customers of First-Class Mail service standards, but such information is made available to customers on www.usps.com. The Postal Service, however, has purchased general advertising encouraging customers to use the mail; copies of two such recent television commercials are provided in library reference USPS LR-N2012-1/74.

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DFC/USPS-T13-5

Please confirm that the customer-facing display connected to POS terminals in some post offices currently suggests, during at least certain periods of the day, that First-Class Mail that customers send will be delivered in one more day than the actual applicable service standard. If you do not confirm, please explain.

RESPONSE

Confirmed. The customer-facing display on the Point of Service (POS) terminal shows the expected delivery date as calculated by the service delivery calculator, based on the current time (of mailing) and the cut-off time for that location in the service standard delivery file.

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DFC/USPS-T13-6

Please confirm that election officials have expressed concerns to the Postal Service about the effect of changes in service standards on timely delivery of mailed ballots in the November 2012 presidential election. If you do not confirm, please explain.

RESPONSE

Confirmed.